

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	Docket Number: 08 CR 354
Plaintiff,)	
)	
v.)	Presiding Judge:
)	The Honorable Judge Morton Denlow
)	
ADEGBITE OLAMREWAJU ADEYEMO,)	
Defendant.)	

MOTION FOR PRETRIAL RELEASE

PURSUANT TO 18 U.S.C. § 3142(a)(2), MR. ADEYEMO, BY HIS COUNSEL, PAUL CAMARENA, RESPECTFULLY moves this Honorable Court to order the United States to release Mr. Adeyemo pretrial. In support of his motion, Mr. Adeyemo states as follows:

The United States' only charge against Mr. Adeyemo has a maximum sentence of only two years, and, thus, there is no presumption that this Honorable Court should order the United States Marshal to detain Mr. Adeyemo. (R. 10 and 8 U.S.C. § 1326; see also 18 U.S.C. § 3142(e).) Of course, 18 U.S.C. § 3142(g) requires this Honorable Court to consider Mr. Adeyemo's danger to the community and the future appearance of Mr. Adeyemo. However, Mr. Adeyemo would submit that those factors support his motion.

Danger to the Community.

Mr. Adeyemo's criminal history consists only of one 25 year old white-collar offense. (Pretrial Services Report, p. 3.)

Future appearance of Mr. Adeyemo.

While Mr. Adeyemo has recently resided in Nigeria and his wife and 9 year old child currently reside in Nigeria, Mr. Adeyemo also has significant ties to the United States community. Mr. Adeyemo has three children who reside in the United States. (Pretrial Report, p. 1.) Also, Mr. Adeyemo is legally residing in the United States, although he is currently under removal proceedings. (Pretrial Report, p. 2.) In addition, Mr. Adeyemo is very close to a United States citizen, Mr. Gregory Salako, who owns a home with equity totaling \$ 286,783.45¹, and Mr. Salako would execute an agreement to forfeit, should Mr. Adeyemo fail to appear, this property.

¹ Exhibit 1: Appraisal, p. 3, Market Value: \$ 465,000.00.
Exhibit 2: Mortgage Statement, Unpaid Principle Balance: \$ 178,216.55.

WHEREFORE, Mr. Adeyemo respectfully moves this Honorable Court to order the United States Marshal to release pretrial Mr. Adeyemo to the custody of Mr. Salako and to order that Mr. Adeyemo submit to Pretrial Services' home incarceration with electronic monitoring.

Respectfully submitted,
Adegbite Adeyemo's Counsel
North & Sedgwick L.L.C.

By: /s/ Paul Camarena
Paul Camarena, Esq.
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Chicago, IL 60610
PaulCamarena@PaulCamarena.Com
(312) 493-7494
(312) 602-4945 (facsimile)

Val-U-Rite Appraisal Company
P.O. Box 5587
Buffalo Grove, IL 60089
847-634-6800

Document 15-2

Filed 07/15/2008

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INVOICE	07/11/2008	08070020
	DATE	NUMBER

Client: GREGORY SALAKO
1812 S. STATE ST, #14
CHICAGO, IL 60616
312-882-1670

Item	Total
APPRaisal FEE FOR SERVICES RENDERED	\$ 250.00
PAID	-250.00

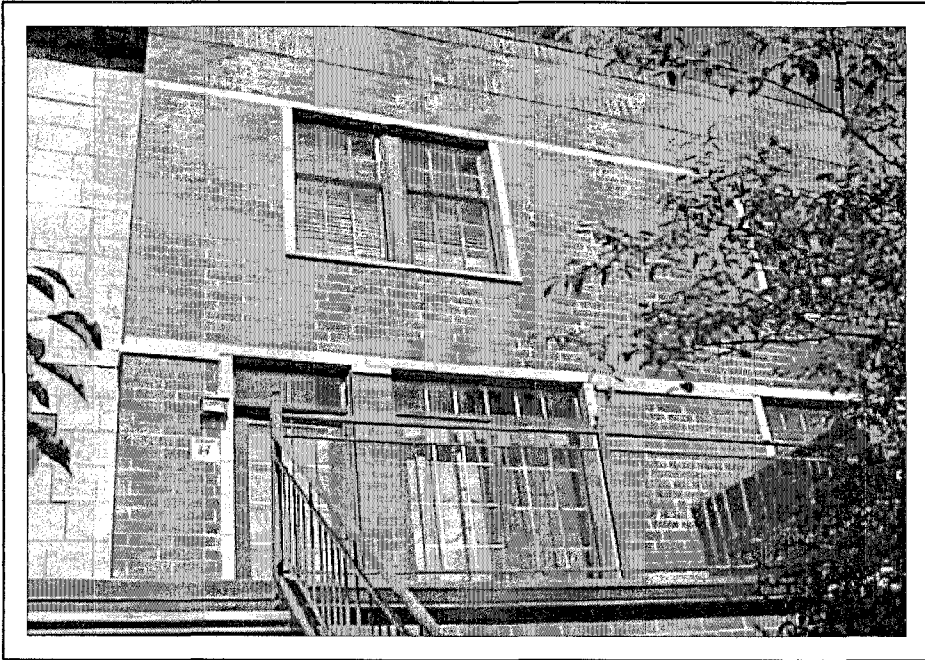
Borrower: SALAKO, GREGORY
1812 S. STATE ST.
CHICAGO, IL 60616

TERMS: DUE UPON RECEIPT
A LATE PAYMENT OF 1.5% WILL BE CHARGED MONTHLY
TO ALL UNPAID BALANCES.

Total: \$

Please detach and include the bottom portion with your payment... Thank You!

Inv Date	Insp Date	Appraiser	Client Case #	File #	Client Phone #
07/11/2008	07/09/2008			08070020	
<div><div>FROM: GREGORY SALAKO 1812 S. STATE ST, #14 CHICAGO, IL 60616 312-882-1670</div><div>PROPERTY: Borrower: SALAKO, GREGORY 1812 S. STATE ST. CHICAGO, IL 60616</div></div>					Amount Due \$
<div>TO: Attention: Val-U-Rite Appraisal Company P.O. Box 5587 Buffalo Grove, IL 60089</div>					Amount Enclosed \$
Balance Due upon receipt of Invoice Please return this portion with your payment. Thank You!					



SUMMARY APPRAISAL REPORT REPORT

OF THE REAL PROPERTY LOCATED AT

1812 S. STATE ST.
CHICAGO, IL 60616

for

GREGORY SALAKO
1812 S. STATE ST, #14
CHICAGO, IL 60616
312-882-1670

as of

07/09/2008

by

VAL-U-RITE APPRAISAL COMPANY
P.O. Box 5587
Buffalo Grove, IL 60089

Desktop Underwriter Quantitative Analysis Appraisal Report

File No. 08070020

THIS SUMMARY APPRAISAL IS INTENDED FOR USE BY THE LENDER/CLIENT FOR A MORTGAGE FINANCE TRANSACTION ONLY.

Note: Race and the racial composition of the neighborhood are not appraisal factors.												
Location	<input checked="" type="checkbox"/> Urban	<input type="checkbox"/> Suburban	<input type="checkbox"/> Rural	Property Values	<input checked="" type="checkbox"/> Increasing	<input checked="" type="checkbox"/> Stable	<input type="checkbox"/> Declining	Single family housing PRICE \$ (000)	Condominium housing PRICE \$ (000)	AGE (yrs)	AGE (yrs)	AGE (yrs)
Built up	<input checked="" type="checkbox"/> Over 75%	<input type="checkbox"/> 25-75%	<input type="checkbox"/> Under 25%	Demand/Supply	<input checked="" type="checkbox"/> Shortage	<input checked="" type="checkbox"/> In balance	<input type="checkbox"/> Over supply					
Growth rate	<input type="checkbox"/> Rapid	<input checked="" type="checkbox"/> Stable	<input type="checkbox"/> Slow	Marketing time	<input checked="" type="checkbox"/> Under 3 mos.	<input checked="" type="checkbox"/> 3-6 mos.	<input type="checkbox"/> Over 6 mos.	28	Low	NEW76	Low	NEW
Neighborhood boundaries THE SUBJECT IS BOUNDED TO THE NORTH BY CONGRESS PRKY, TO THE EAST BY LAKE								650	High	100+1,000	High	100+
MICHIGAN, TO THE SOUTH BY 31ST ST. AND TO THE WEST BY HALSTED ST.									Predominant		Predominant	
								350		80400		80

IMPROVEMENTS	Are there any apparent adverse site conditions (easements, encroachments, special assessments, slide areas, etc.)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, attach description.									
	Source(s) used for physical characteristics of property: <input checked="" type="checkbox"/> Interior and exterior inspection <input type="checkbox"/> Exterior inspection from street <input type="checkbox"/> Previous appraisal files									
	<input checked="" type="checkbox"/> MLS <input checked="" type="checkbox"/> Assessment and tax records <input type="checkbox"/> Prior inspection <input type="checkbox"/> Property owner <input type="checkbox"/> Other (Describe):									
	No. of Stories <u>THREE</u> Type (Det./Att.) <u>ATT</u> Exterior Walls <u>BRICK/AVS</u> Roof Surface <u>ASPHALT</u> Manufactured Housing <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No									
	Does the property generally conform to the neighborhood in terms of style, condition, and construction materials? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, attach description.									
IMPROVEMENTS	Are there any apparent physical deficiencies or conditions that would affect the soundness or structural integrity of the improvements or the livability of the property?									
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, attach description.									
IMPROVEMENTS	Are there any apparent adverse environmental conditions (hazardous wastes, toxic substances, etc.) present in the improvements, on the site, or in the immediate vicinity of the subject property? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, attach description.									

I researched the subject market area for comparable listings and sales that are the most similar and proximate to the subject property.

My research revealed a total of 26 sales ranging in sales price from \$ 420,000 to \$ 532,500.

My research revealed a total of 26 listings ranging in list price from \$ 442,000 to \$ 544,500.

The analysis of the comparable sales below reflects market reaction to significant variations between the sales and the subject property.

A Analysis of any current agreement of sale, option, or listing of the subject property and analysis of the prior sales of subject and comparables: RESEARCH INDICATES NO SALES
 L OR TRANSFERS FOR THE SUBJECT PAST 36 MONTHS. COMPARABLES AS INDICATED.
 Y
 S Summary of sales comparison and value conclusion: SEE APPENDUM.

BASED ON AN ☐ EXTERIOR INSPECTION FROM THE STREET OR AN ☒ INTERIOR AND EXTERIOR INSPECTION, I ESTIMATE THE MARKET VALUE, AS DEFINED, OF THE REAL PROPERTY THAT IS THE SUBJECT OF THIS REPORT TO BE \$ 465,000. AS OF 07/00/2008



Return Mail Operations
PO Box 14411
Des Moines, IA 50306-3411

Monthly Mortgage Statement

Statement Date 03/17/08
Loan Number 0036018653

Customer Service

Online
wellsfargo.com

Telephone
(866) 234-8271

TTY Deaf/Hard of Hearing
(800) 934-9998

Fax
(866) 278-1179

Payments Correspondence
PO Box 5296 PO Box 10335
Carol Stream IL 60197 Des Moines IA 50306

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GREGORY A SALAKO
1812 S STATE ST APT 14
CHICAGO IL 60616-1696



Summary

Payment (Principal and/or Interest, Escrow)	\$2,127.35
Optional Product(s)	\$0.00
Current Monthly Payment	\$2,127.35
Overdue Payments	\$0.00
Unpaid Late Charge(s)	\$0.00
Other Charges	\$0.00
TOTAL PAYMENT DUE 08/01/08	\$2,127.35

Property Address

1812 S STATE STREET
CHICAGO IL 60616

Unpaid Principal Balance \$178,216.55
(Contact Customer Service for your payoff balance)

Interest Rate 5.250%
Interest Paid Year-to-Date \$5,589.13
Taxes Paid Year-to-Date \$1,572.76
Escrow Balance \$1,941.67

Activity Since Your Last Statement

Date	Description	Total	Principal	Interest	Escrow	Late Charge	Other
03/17	*PAYMENT		\$1,080.79	\$784.43	\$262.13		
03/17	*PAYMENT		\$1,076.09	\$789.13	\$262.13		
03/17	*PAYMENT		\$1,071.40	\$793.82	\$262.13		
03/17	*PAYMENT		\$1,066.73	\$798.49	\$262.13		
03/17	*PAYMENT	\$10,636.75	\$1,062.09	\$803.13	\$262.13		
02/27	TAX PAYMENT	\$5.00-			\$5.00-	COOK CO TAX BILL FEE(4)	

*Wells Fargo Easy Pay payment has been applied. Amount shown exclusive of applicable fees.

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Please detach and return with your payment

Loan Number	0036018653
Current Monthly Payment Due	\$2,127.35
Total Payment Due 08/01/08	\$2,127.35
After 08/16/08 Add Late Fee	\$93.26
Total Amount Due After 08/16/08	\$2,220.61

Check here and see
reverse for address
correction.

GREGORY A SALAKO

2292/000000/002292 000 01 AMW66 708

WELLS FARGO HOME MORTGAGE
PO BOX 5296
CAROL STREAM IL 60197-5296



Total Amount For Period
(Please do not send cash)

708 0036018653 2 10000212735022206102127350000000 000000001497843277 9